

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**VALTRUS INNOVATIONS LTD.,**

**Plaintiff,**

**vs.**

**SAP AMERICA, INC. AND SAP SE,**

**Defendants.**

**Civil Action No. 2:24-cv-21**

**JURY TRIAL DEMANDED**

**DECLARATION OF SAMIR N. PANDYA IN SUPPORT OF DEFENDANTS SAP  
AMERICA, INC., AND SAP SE'S REPLY BRIEF IN SUPPORT OF THEIR MOTION  
FOR INTRA-DISTRICT TRANSFER UNDER 28 U.S.C. § 1404(a)**

In accordance with 28 U.S.C. § 1746, I, Samir N. Pandya, declare as follows:

1. I am employed by SAP America, Inc. and work in Newtown Square, Pennsylvania.

I am the Head of Global Litigation and have been employed by SAP for over 16 years.

2. I make this declaration in support of Defendants SAP America Inc. and SAP SE's (collectively, "SAP") reply brief, which is further in support of their Motion for Intra-District Transfer Under 28 U.S.C. § 1404(a). (ECF 22). Unless otherwise indicated below, I have knowledge of the facts set forth herein based on my personal knowledge, my review of corporate records maintained by SAP in the ordinary course of business, and/or my discussions with other SAP employees.

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 11, 2024.

DocuSigned by:  
  
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Samir N. Pandya